



**BOULT • CUMMINGS  
CONNERS • BERRY PLC**

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February 20, 2004

Honorable Deborah Taylor Tate, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

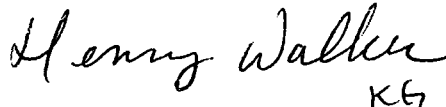
Re Implementation of the Federal Communications Commission's Triennial  
Review Order--9 Month Proceeding—Switching  
Docket No 03-00491

Dear Chairman Tate

Enclosed please find the original and fourteen (14) copies of AT&T Communications of the South Central States, LLC's First Set of Interrogatories (Nos 1-2) to Sprint in the above-captioned proceeding

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By   
Henry Walker KG

HW/k

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**February 20, 2004**

<i>IN RE</i>	)	Docket No 03-00491
<i>IMPLEMENTATION OF THE FEDERAL</i>	)	
<i>COMMUNICATIONS COMMISSION'S</i>	)	
<i>TRIENNIAL REVIEW ORDER – 9 MONTH</i>	)	
<i>PROCEEDING - SWITCHING</i>		

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**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC'S FIRST SET  
OF INTERROGATORIES (NOS. 1-2) TO SPRINT**

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AT&T Communications of the South Central States, LLC ("AT&T"), hereby serves its First Set of Interrogatories (Nos 1-2) to Sprint Communications Company, L P , United Telephone-Southeast, Inc and Sprint Spectrum, L P d/b/a Sprint PCS (collectively "the Sprint Companies")

**DEFINITIONS**

1 "Sprint" means Sprint Communications Company, L P , United Telephone-Southeast, Inc and Sprint Spectrum, L P d/b/a Sprint PCS and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of Sprint

2 The terms "you" and "your" refer to Sprint

3 "CLEC" means a "Competitive Local Exchange Carrier," as defined in 47 U S C § 153(26), which is not an "incumbent local exchange carrier" as defined in 47 U S C § 251(h)

4 "AT&T" means AT&T Communications of the South Central States, LLC, its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T

5 The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity

6 The term "document" shall have the broadest possible meaning under applicable law "Document" means every writing or record of every type and description that is in the possession, custody or control of Sprint, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files, and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices

7 The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents

8 The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving, dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed

9 "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope

10 of these discovery requests any information that would otherwise not be brought within their scope

11 "Affiliate" or "affiliated" means an entity that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, another entity

12 The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter

13 "Identify" or "identifying" or "identification" when used in reference to a natural person means to state

- a) the full legal name of the person,
- b) the name, title and employer of the person at the time in question,
- c) the present or last known employer of such person,
- d) the present or last known home and business addresses of the person, and
- e) the present home address

14 "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state

- a) the full name of the person and any names under which it conducts business,
- b) the present or last known address of the person, and
- c) the present or last known telephone number of the person

15 "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following

- a) the type of document (e g , letter, memorandum, etc ),
- b) the date of the document,
- c) the title or label of the document,
- d) the Bates number or other identifier used to number the document for use in litigation,
- e) the identity of the originator,
- f) the identity of each person to whom it was sent,
- g) the identity of each person to whom a copy or copies were sent,
- h) a summary of the contents of the document,
- i) the name and last known address of each person who presently has possession, custody or control of the document, and \*
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it (1) is missing or lost, (2) has been destroyed, or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition

16 "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication was written or oral, the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication

17 “Hot cut” refers to the entire process necessary to physically transfer from one carrier to another a working voice grade access line that remains working after the transfer

18 “Bulk Hot Cut” refers to any hot cut(s) performed by Sprint in which multiple customers of a CLEC are migrated to the CLEC or to a different network configuration (UNE-P to UNE-L), and managed by Sprint as a joint migration event or project

19 “Individual Hot Cut” refers to all hot cuts that are not bulk hot cuts

20 “Access Line” refers to a working analogue voice grade access line used to serve residential and small business customers, or a working voice grade line served by Digital Loop Carrier Systems (“DLC”) that is used for serving residential and small business customers “Access Line” does not, for example, include high capacity systems such as DS1 and ISDN-PRI

21 Digital Loop Carrier (“DLC”) includes IDLC (integrated) UDLC (Universal) and NGDLC (Next Generation)

22 “ILEC” refers to Incumbent Local Exchange Carrier

23 “CLLI code” refers to Common Language Location Identifier

24 “CO” refers to Central Office

25 “Coordinated cut over” refers to coordination of the loop migration from the ILEC switch to the CLEC switch

26 “Coordinated time-specific cut over” refers to coordination of the loop migration from the ILEC switch to the CLEC switch at a time specified by the CLEC and agreed to by the ILEC

27 “CWINS” refers to Customer Wholesale Interconnection Services

28 “DSO” refers to Digital Signal, level zero

29 “FCC” refers to the Federal Communications Commission

30 “LCSC” refers to Local Carrier Service Center

- 31 "LSR" refers to Local Service Request
- 32 "MDF" refers to Main Distribution Frame
- 33 "OSS" refers to Operational Support Systems
- 34 "PIC" refers to Primary Interexchange Carrier
- 35 "SEEM" refers to Self Effectuating Enforcement Mechanism
- 36 "UNE" refers to Unbundled Network Element
- 37 "UNE-L" refers to Unbundled Network Element-Loop
- 38 "UNE-P" refers to Unbundled Network Element –Platform
- 39 "LIDB" refers to Line Information Database
- 40 "MSA" refers to Metropolitan Statistical Area
- 41 "LATA" refers to Local Access and Transport Area
- 42 Unless otherwise stated, information requests refer to Sprint's region

### **GENERAL INSTRUCTIONS**

1 If you contend that any response to any Interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim

- a) the privilege asserted and its basis,
- b) the nature of the information withheld, and
- c) the subject matter of the document, except to the extent that you claim it is privileged

2 These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are

intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained

3 If any Interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully

4 These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known

5 For each Interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer

6 To the extent Sprint has previously provided a response to any Interrogatory, which prior response is responsive to any of the following Interrogatories, in Sprint's region or any other state in proceedings in which Sprint and AT&T are parties, Sprint need not respond to such Interrogatory again, but rather may respond to such Interrogatory by identifying the prior response to such Interrogatory by state, proceeding, docket number, date of response, and the number of such response. If such prior response does not respond to the Interrogatory contained below in its entirety, you should provide all additional information necessary to make your answers to these Interrogatories complete

### **INTERROGATORIES**

1 What costs, in terms of time, labor and materials, does Sprint incur when installing and maintaining a DS1 channel bank in Tennessee?

RESPONSE

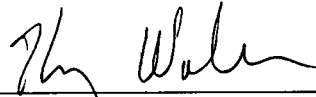
2 Are the costs identified in response to question number 1 appropriate for use in calculating the cross-over point at which a multiple DS0 line customer would more economically be served by a DS1?

RESPONSE



Respectfully submitted this 20th day of February, 2004

BOULT, CUMMINGS, CONNERS & BERRY, PLC



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Attorneys for AT&T Communications of the  
South Central States, LLC

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served on the parties of record, via electronic service to URL link

[http://www.compsouth.net/filings.php?Docket\\_id=10](http://www.compsouth.net/filings.php?Docket_id=10)

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